

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

FEB 18 2020

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

§

vs.

§

CRIMINAL NO. **B-20-118**

CYNTHIA NALLELI ALANIS

§

SEALED
INDICTMENT

THE GRAND JURY CHARGES:

INTRODUCTION**At all times material to this indictment:**

The "El Valle Detention Center" (EVDC) is an immigration detention facility located in Raymondville, Texas, and operated by the Management and Training Corporation (MTC) under contract with Immigration and Customs Enforcement (ICE) to detain alien immigrants awaiting disposition of immigration cases and/or removal from the United States (U.S.).

The "Willacy County Regional Detention Center" (WCRDC) is a detention facility located in Raymondville, Texas. WCRDC houses federal inmates detained by ICE and by the United States Marshals Service.

The "Port Isabel Detention Center" (PIDC) is an immigration detention facility located in Los Fresnos, Texas, operated by ICE, where alien immigrants are detained while awaiting disposition of immigration cases and/or removal from the U.S.

"Alien Detainee Roster Lists" (Detainee Roster or Detainee Rosters) contain names, dates of birth, country of origin, and "A numbers" of alien detainees, as well as housing assignments. Detainee Rosters are law enforcement sensitive and are for official use only, intended to be utilized by facility employees in the course of their official duties. Removal of Detainee Rosters from ICE detention facilities is strictly prohibited.

CYNTHIA NALLELI ALANIS was an attorney licensed to practice in the state of Texas with a practice in the Rio Grande Valley, who received Detainee Rosters; and who would also visit aliens for the purpose of hiring ALANIS' law firm as their attorney in immigration proceedings.

CYNTHIA NALLELI ALANIS would obtain Detainee Rosters from others and would then visit alien immigrant detainees at detention facilities seeking employment for the law firm in immigration matters.

Making False/Fraudulent Statement (18 USC 1001)

On or about February 21, 2019, in the Southern District of Texas, the defendant,

CYNTHIA NALLELI ALANIS,


did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation to Immigration and Customs Enforcement Office of Professional Responsibility to Special Agent Benjamin Elizondo in a matter within the jurisdiction of the executive branch of the Government of the United States, that is, the Immigration and Customs Enforcement (ICE), by stating she did not receive nor know about any alien detainee roster lists given to the Alanis law firm. The statement and representation was false because, as defendant then knew, she had previously received detainee roster lists and also knew of such lists given to the law firm.

In violation of Title 18, United States Code, Section 1001.

A TRUE BILL:

FOREPERSON OF THE GRAND JURY

RYAN K. PATRICK
UNITED STATES ATTORNEY



Oscar Ponce
Assistant United States Attorney